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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	DOCKET FILE COPY ORIGINAL
Petition of WorldCom, Inc. Pursuant	)	
to Section 252(e)(5) of the	)	
Communications Act for Expedited	)	
Preemption of the Jurisdiction of the	)	CC Docket No. 00-218
Virginia State Corporation Commission	)	
Regarding Interconnection Disputes	)	
with Verizon Virginia Inc., and for	)	
Expedited Arbitration	)	
	)	
In the Matter of	)	
Petition of Cox Virginia Telecom, Inc.	)	
Pursuant to Section 252(e)(5) of the	)	CC Docket No. 00-249
Communications Act for Preemption	)	
of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
Virginia Inc. and for Arbitration	)	
	)	
In the Matter of	)	
Petition of AT&T Communications of	)	
Virginia Inc., Pursuant to Section 252(e)(5)	)	CC Docket No. 00-251
of the Communications Act for Preemption	)	
of the Jurisdiction of the Virginia	)	
Corporation Commission Regarding	)	
Interconnection Disputes With Verizon	)	
Virginia Inc.	)	

**VERIZON VIRGINIA INC.'S OBJECTIONS  
TO AT&T AND WORLDCOM'S EIGHTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Eighth Set of Data Requests served on Verizon jointly by AT&T and WordCom on August 10, 2001.

## **GENERAL OBJECTIONS**

1. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.
2. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.
3. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.
4. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad, unduly burdensome or vague.
5. Verizon objects to AT&T and WorldCom's Data Requests because the cumulative burden of responding to these 16 requests (some with multiple subparts) and more than 600 prior requests (many with subparts) unfairly and excessively interferes with Verizon's ability to prepare its case. The timing of these requests impairs Verizon's ability to prepare its case because the same Verizon personnel whose expertise is necessary for responding to these requests are currently preparing Verizon's rebuttal testimony.

6. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

7. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory. According to the Arbitrator's letter of August 3, 2001, parties seeking information about Verizon's operations in other states must establish that "such information is relevant to the specific disputes over contract language presented in this proceeding."

8. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia.

9. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T, WorldCom or any other entity.

10. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T or WorldCom.

The General Objections identified above shall apply to each and every Data Request below.

## **DATA REQUESTS**

1. Verizon's cost panel states at page 124 that "[f]iber extension of xDSL-transported services, involving the placement of either a stand-alone remote DSLAM at the RT or a DSLAM integrated in a POTS DLC RT, has not been deployed in Virginia."
  - a. Does Verizon currently deploy any such technology elsewhere (outside of Virginia)? If yes, please identify the technology used and indicate where and when it was deployed.
  - b. Does Verizon have any plans to deploy such technology in Virginia? If so, when does Verizon expect it to be deployed?
  - c. Is Verizon currently testing any technology for fiber extension of xDSL-transported services? If so, please provide details.<sup>1</sup>
2. Verizon's cost panel states at page 129 that "CLECs can request and receive certain information contained in LFACS electronically." To what information does the panel refer? Can CLECs request and receive the information electronically, or must CLECs request such information through the Manual Loop Qualification or Engineering Query process?
3. Does the LFACS database contain information on loop characteristics, including, but not limited to cable gauges, load coil locations, bridged tap length, etc.? Please specifically identify the information on loop characteristics contained within the LFACS database.
4. Verizon's cost panel states at pages 132-133 that the Mechanized Loop Qualification charge is "a recurring monthly charge imposed on all xDSL-capable loops and line sharing and line splitting arrangements ordered by CLECs." Has Verizon calculated the charge assuming demand of *all* xDSL, line sharing and line splitting arrangements, including retail and all of those provided by Verizon's advanced data affiliate? If not, explain why not.
5. Why is Verizon proposing a monthly recurring charge for Mechanized Loop Qualification, as opposed to a per query charge?
6. How many queries to the Loop Qualification Database does Verizon expect in each of the next five years? Provide all information which is the basis for this estimate.

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<sup>1</sup> These requests seek information of Verizon's practice outside Virginia to assess the propriety of the technologies included in Verizon's cost model and the costs associated with those technologies. To the extent that Verizon does not reflect xDSL technology in the cost model, purportedly because Verizon has not installed xDSL in Virginia, Verizon is not reflecting the use of forward-looking technologies. If Verizon has xDSL technology installed elsewhere in its network or plans to deploy xDSL in Virginia, that fact will demonstrate that xDSL technology is a forward-looking technology, the costs for which should be reflected in the cost model.

7. Does Verizon use any of the information gathered through the creation of the loop qualification database (e.g. MLT testing) to update other company databases, such as LFACS?
8. How has Verizon ensured that its costs for developing or maintaining the loop qualification database have been excluded from the expenses used to develop its factors, such as ACFs, EF&I, etc.? Provide all workpapers or other documentation.
9. Verizon's cost panel states at page 150 that the WTS "equipment and associated operational support will allow Verizon VA to minimize its forward-looking costs for trouble shooting on shared loops." How has Verizon reflected these savings in its recurring cost estimates. Please provide complete support and documentation.
10. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the claim at page 158 of Verizon's Cost Panel Testimony that "[t]he material costs [of splitters] are relatively low compared to the installation costs, and thus absence of the latter results in understatement of the factor, certainly not overstatement."
11. Please provide complete copies of the quotes that the vendors Teletech and Orius provided to Verizon for installing a splitter shelf and a full component of splitter cards, (Verizon Cost Panel Testimony at page 158.) Please complete copies of any supporting documentation, including a list of the tasks that the vendors would perform and any instructions, requests for bids, etc. that were provided to the vendors when asking for these quotes.
12. Verizon's Cost Panel Testimony states at page 316 that "[f]ield managers were polled by the cost analysts" to determine occurrence factors.
  - a. Was that poll conducted as a part of the work-time survey or separately?
  - b. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the polling of field managers.
13. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the precision levels calculated by NERA (Verizon Cost Panel Testimony at 323).
14. Refer to Verizon's Cost Panel Testimony at page 250.
  - a. Were any of the "Access to OSS" interfaces or functionalities developed in Verizon-East-South in 1996 and/or 1997 superceded by, replaced by or

duplicative of any of the interfaces or functionalities developed in Verizon-East-North? If yes, please identify each system and the costs associated with its development for each of the years 1996-1999.

- b. Were any of the "Access to OSS" interfaces or functionalities developed in Verizon-East-North in 1996 and/or 1997 superceded by, replaced by or duplicative of any of the interfaces or functionalities developed in Verizon-East-South? If yes, please identify each system and the costs associated with its development for each of the years 1996-1999.
- c. Were any of the "Access to OSS" interfaces or functionalities developed in Verizon-East (South and/or North) in 1996 and/or 1997 superceded by, replaced by or duplicative of any of the interfaces or functionalities developed in Verizon-East in 1998 and/or 1999? If yes, please identify each system and the costs associated with its development for each of the years 1996-1999.
- d. Were any of the "Access to OSS" interfaces or functionalities developed in Verizon-East (South and/or North) in 1996 and/or 1997 superceded by, replaced by or duplicative of any of the interfaces or functionalities developed in Verizon-East in 1998 and/or 1999? If yes, please identify each system and the costs associated with its development for each of the years 1996-1999.<sup>2</sup>

15. Please provide all documents, including any business case, discussing or constituting a basis for any decision by BA or BA-NY to purchase or standardize on the Wideband Test System.

16. Provide documentation supporting all of the entries on the "Price List" tab of the Excel spreadsheet "5.7 DLC Hardware and CommonXLS." Identify separately the manufacturer discounts reflected in the Price List. Also define the meanings of "Net Price, Original Price, and 2001 Price."

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<sup>2</sup> Request 14 and its subparts request information beyond the Verizon-Virginia area. This material is directly relevant to the resolution of the appropriate cost for OSS costs and Access to OSS costs, one of several recurring costs to be decided as part of Issue I-1. In Verizon's Direct Panel Testimony at pages 250 et seq., Verizon explains that it calculated its proposed OSS rates using information from the Verizon East-South and Verizon East-North regions. Specifically, Verizon proposes that "the core OSS development costs incurred in 1996 and 1997 in either region (Verizon East-North or Verizon East-South) be assigned to that region." Moreover, Verizon proposes that "all OSS development work beginning in January 1998 for interfaces and core systems be shared among all the Verizon East jurisdictions." Verizon Cost Panel Testimony at 250. AT&T/WCOM needs access to information from Verizon East-North and Verizon East-South to determine whether Verizon's assignments of core OSS development costs from 1996 and 1997 between these two regions are reasonable. Similarly, AT&T/WCOM needs access to information from Verizon East-North and Verizon East-South to assess the propriety of the costs Verizon plans to share across the entire Verizon East region. Given that Verizon is relying on regionwide information to generate its proposed costs, AT&T/WCOM respectfully request this region-wide information to assess Verizon's proposed costs.

Respectfully submitted,

  
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